

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

LIGADO NETWORKS LLC and
LIGADO NETWORKS (CANADA) INC,

Plaintiffs,

v.

INMARSAT GLOBAL LIMITED,

Defendant.

Case No. _____

Index No. 651526/2025
(pending in New York State Supreme
Court, New York County)

DECLARATION OF CHARLES MICHAEL

1. I am a partner of Steptoe LLP and counsel for the Defendant in the above-captioned action. I submit this declaration in support of the Defendant's Notice of Removal.

2. Attached are true and correct copies of the following exhibits:

Ex.	Document
A	Complaint, NYSCEF No. 1, <i>Ligado Networks, LLC, et al. v. Inmarsat Global Limited</i> , Ind. No. 651526/2025 (N.Y. Sup. Ct. Mar. 19, 2025)
B	Disclosure Statement for the Joint Chapter 11 Plan of Ligado and its Affiliated Debtors and Debtors In Possession, ECF No. 349, <i>In re Ligado Networks LLC, et al.</i> , No. 25-10006 (TMH) (D. Del. Bankr. Mar. 22, 2025)
C	Complaint, ECF No. 1, <i>Ligado Networks LLC v. United States</i> , No. 23-1797-L (Fed. Ct. Cl. Oct. 12, 2023)
D	Ligado Bankruptcy Petition, ECF No. 1, <i>In re Ligado Networks LLC, et al.</i> , No. 25-10006 (TMH) (D. Del. Bankr. Jan. 5, 2025)
E	Debtors' Adversary Proceeding Complaint, ECF No. 3, <i>Ligado Networks LLC et al. v. Inmarsat Global Limited</i> , Adv. Proc. No. 25-5000 (TMH) (D. Del. Bankr. Jan. 9, 2025)
F	Inmarsat Global Limited's Brief in Support of its Motion to Dismiss Adversary Complaint, ECF No. 25, <i>Ligado Networks LLC et al. v. Inmarsat Global Limited</i> , Adv. Proc. No. 25-5000 (TMH) (D. Del. Bankr. Feb. 27, 2025)
G	Debtors' Notice of Dismissal Without Prejudice, ECF No. 31, <i>Ligado Networks LLC et al. v. Inmarsat Global Limited</i> , Adv. Proc. No. 25-5000 (TMH) (D. Del. Bankr. Mar. 19, 2025)

Ex.	Document
H	Transcript of Hybrid Zoom Hearing, <i>In re Ligado Networks LLC, et al.</i> , No. 25-10006 (TMH) (D. Del. Bankr. Jan. 7, 2025).
I	Ligado's Motion for Entry of an Order (I) Authorizing the Debtors to Enter into the AST Definitive Documents and (II) Granting Related Relief, ECF No. 359, <i>In re Ligado Networks LLC, et al.</i> , No. 25-10006 (TMH) (D. Del. Bankr. Mar. 26, 2025)
J	Exhibit B to Debtor's Motion for Entry of an Order (I) Authorizing the Debtors to Enter into the AST Definitive Documents and (II) Granting Related Relief, Framework Agreement, ECF No. 359-3, <i>In re Ligado Networks LLC, et al.</i> , No. 25-10006 (TMH) (D. Del. Bankr. Mar. 26, 2025)
K	Inmarsat Global Limited's Motion to Compel Ligado Networks LLC and Ligado Networks (Canada)'s Compliance with 11 U.S.C. §§ 365(d)(5) and 503(b), ECF No. 193, <i>In re Ligado Networks LLC, et al.</i> , No. 25-10006 (TMH) (D. Del. Bankr. Feb. 6, 2025)
L	Debtors' Objection to Inmarsat's Motion to Compel, ECF No. 268, <i>In re Ligado Networks LLC, et al.</i> , No. 25-10006 (TMH) (D. Del. Bankr. Feb. 25, 2025)
M	Affirmation of Service, NYSCEF No. 2, <i>Ligado Networks, LLC, et al. v. Inmarsat Global Limited</i> Ind. No. 651526/2025, (N.Y. Sup. Ct. Mar. 28, 2025)
N	Docket Sheet, <i>Ligado Networks, LLC, et al. v. Inmarsat Global Limited</i> , Ind. No. 651526/2025 (N.Y. Sup. Ct.)

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
April 4, 2025

Respectfully Submitted,

/s/ Charles Michael